# IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re:	Chapter 11
FTX TRADING LTD., et al.,1	Case No. 22-11068 (JTD)
Debtors.	(Jointly Administered)

AMENDED<sup>2</sup> NOTICE OF AGENDA FOR HEARING SCHEDULED FOR JANUARY 11, 2023, AT 09:00 A.M. (ET), BEFORE THE HONORABLE JOHN T. DORSEY AT THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE, LOCATED AT 824 NORTH MARKET STREET, 5TH FLOOR, COURTROOM NO. 5, WILMINGTON, DELAWARE 19801

ALL PARTICIPANTS, INCLUDING ATTORNEYS INTENDING
TO PRESENT AT THE HEARING AND WITNESSES, MUST BE PHYSICALLY
PRESENT IN THE COURTROOM. ANY NON-PARTICIPANT MAY VIEW
THE HEARING VIA ZOOM BY REGISTERING IN ADVANCE AT
THE LINK BELOW BY JANUARY 11, 2023 AT 7:00 A.M. (ET)

Non-participants, please use the following link to register for this hearing:

https://debuscourts.zoomgov.com/meeting/register/vJItfu-qqjktGzIMRY1-ELF-49TojRHUoQ8

After registering your appearance by Zoom, you will receive a confirmation email containing information about joining the hearing.

Topic: FTX Trading Ltd., *et al.* - Case No. 22-11068 (JTD) When: January 11, 2023 at 09:00 a.m. (ET)

YOU MUST USE YOUR FULL NAME WHEN LOGGING INTO ZOOM OR YOU WILL NOT BE ALLOWED INTO THE MEETING.

# **ADJOURNED MATTERS:**

1. Debtors' Application for an Order Authorizing the Retention and Employment of Sullivan & Cromwell LLP as Counsel to the Debtors and Debtors-In-Possession *Nunc Pro Tunc* to the Petition Date [D.I. 270, filed on December 21, 2022]

The last four digits of FTX Trading Ltd.'s and Alameda Research LLC's tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at https://cases.ra.kroll.com/FTX.

<sup>2</sup> Amended items appear in bold.

Response Deadline: January 4, 2023 at 4:00 p.m. (ET), extended for the United States Trustee and the Official Committee of Unsecured Creditors to January 12, 2023 at 4:00 p.m. (ET)

# Responses Received:

- A. Informal comments received from the Office of the United States Trustee
- B. Objection to the Debtors' Application for an Order Authorizing the Retention and Employment of Sullivan & Cromwell LLP as Counsel to the Debtors and Debtors-in-Possession *Nunc Pro Tunc* to the Petition Date. [D.I. 369, filed on January 4, 2023]
- C. Amended Objection to Debtors' Application for an Order Authorizing the Retention and Employment of Sullivan & Cromwell LLP as Counsel to the Debtors and Debtors-in-Possession *Nunc Pro Tunc* to the Petition Date. [D.I. 459, filed on January 10, 2023]

# **Related Documents:**

- A. [SEALED] Schedule 2 to the Declaration of Andrew G. Dietderich in Support of Debtors' Application for an Order Authorizing the Retention and Employment of Sullivan & Cromwell LLP as Counsel to the Debtors and Debtors-In-Possession *Nunc Pro Tunc* to the Petition Date [D.I. 271, filed on December 21, 2022]
- B. Notice of Hearing [D.I. 287, filed on December 21, 2022]
- C. [SEALED] Notice of Filing Under Seal Unredacted Parties in Interest List [D.I. 288, filed on December 21, 2022]

Status: This matter is adjourned to the hearing scheduled on January 20, 2023 at 10:00 a.m. (ET).

2. Debtors' Application for an Order Authorizing the Retention and Employment of Alvarez & Marsal North America, LLC as Financial Advisors to the Debtors and Debtors-In-Possession Pursuant to Sections 327(a) and 328 of the Bankruptcy Code *Nunc Pro Tunc* to the Petition Date [D.I. 273, filed on December 21, 2022]

Response Deadline: January 4, 2023 at 4:00 p.m. (ET), extended for the United States Trustee and the Official Committee of Unsecured Creditors to January 12, 2023 at 4:00 p.m. (ET)

# Responses Received:

A. Informal comments received from the Office of the United States Trustee

#### Related Documents:

A. [SEALED] Schedule B to the Declaration of Edgar W. Mosley II in Support of

Debtors' Application to Employ and Retain Alvarez & Marsal North America, LLC as Financial Advisors to Debtors and Debtors-In-Possession Pursuant to Sections 327(a) and 328 of the Bankruptcy Code *Nunc Pro Tunc* to the Petition Date [D.I. 274, filed on December 21, 2022]

- B. Notice of Hearing [D.I. 287, filed on December 21, 2022]
- C. [SEALED] Notice of Filing Under Seal Unreducted Parties in Interest List [D.I. 288, filed on December 21, 2022]

Status: This matter is adjourned to the hearing scheduled on January 20, 2023 at 10:00 a.m. (ET).

3. Debtors' Application for an Order (I) Authorizing the Retention and Employment of Perella Weinberg Partners LP as Investment Banker to the Debtors *Nunc Pro Tunc* to November 16, 2022 and (II) Waiving Certain Reporting Requirements Pursuant to Local Rule 2016-2(h) [D.I. 275, filed on December 21, 2022]

Response Deadline: January 4, 2023 at 4:00 p.m. (ET), extended for the United States Trustee and the Official Committee of Unsecured Creditors to January 12, 2023 at 4:00 p.m. (ET)

# Responses Received:

A. Informal comments received from the Office of the United States Trustee

# **Related Documents:**

- A. Notice of Hearing [D.I. 287, filed on December 21, 2022]
- B. [SEALED] Notice of Filing Under Seal Unreducted Parties in Interest List [D.I. 288, filed on December 21, 2022]

Status: This matter is adjourned to the hearing scheduled on January 20, 2023 at 10:00 a.m. (ET).

4. Debtors' Application for an Order Authorizing the Retention and Employment of AlixPartners, LLP as Forensic Investigation Consultant to the Debtors *Nunc Pro Tunc* to November 28, 2022 [D.I. 277, filed on December 21, 2022]

Response Deadline: January 4, 2023 at 4:00 p.m. (ET), extended for the United States Trustee and the Official Committee of Unsecured Creditors to January 12, 2023 at 4:00 p.m. (ET)

# Responses Received:

A. Informal comments received from the Office of the United States Trustee

#### Related Documents:

- A. [SEALED] Schedule 2 to the Declaration of Matthew Evans in Support of the Debtors' Application for an Order Authorizing the Retention and Employment of AlixPartners, LLP as Forensic Investigation Consultant *Nunc Pro Tunc* to November 28, 2022 [D.I. 278, filed on December 21, 2022]
- B. Notice of Hearing [D.I. 287, filed on December 21, 2022]
- C. [SEALED] Notice of Filing Under Seal Unreducted Parties in Interest List [D.I. 288, filed on December 21, 2022]

Status: This matter is adjourned to the hearing scheduled on January 20, 2023 at 10:00 a.m. (ET).

5. Debtors' Application for Entry of an Order Authorizing the Retention and Employment of Quinn Emanuel Urquhart & Sullivan, LLP as Special Counsel for the Debtors and the Debtors in Possession, *Nunc Pro Tunc* to November 13, 2022 [D.I. 280, filed on December 21, 2022]

Response Deadline: January 4, 2023 at 4:00 p.m. (ET), extended for the United States Trustee and the Official Committee of Unsecured Creditors to January 12, 2023 at 4:00 p.m. (ET)

# Responses Received:

A. Informal comments received from the Office of the United States Trustee

#### Related Documents:

- A. [SEALED] Schedule 2 to the Declaration of William A. Burck in Support of the Debtors' Application for Entry of an Order Authorizing the Retention and Employment of Quinn Emanuel Urquhart & Sullivan, LLP as Special Counsel for the Debtors and the Debtors in Possession, *Nunc Pro Tunc* to November 13, 2022 [D.I. 281, filed on December 21, 2022]
- B. Notice of Hearing [D.I. 287, filed on December 21, 2022]
- C. [SEALED] Notice of Filing Under Seal Unreducted Parties in Interest List [D.I. 288, filed on December 21, 2022]

Status: This matter is adjourned to the hearing scheduled on January 20, 2023 at 10:00 a.m. (ET).

6. Debtors' Application for an Order Authorizing the Retention and Employment of Ernst & Young LLP as Tax Services Provider *Nunc Pro Tunc* to November 28, 2022 [D.I. 284, filed on December 21, 2022]

Response Deadline: January 4, 2023 at 4:00 p.m. (ET), extended for the United States

Trustee and the Official Committee of Unsecured Creditors to January 12, 2023 at 4:00 p.m. (ET)

# Responses Received:

A. Informal comments received from the Office of the United States Trustee

# Related Documents:

- A. [SEALED] Declaration of Thomas M. Shea in Support of Debtors' Application for Order Authorizing the Retention and Employment of Ernst & Young LLP as its Tax Services Provider, *Nunc Pro Tunc* to November 28, 2022 [D.I. 285, filed on December 21, 2022]
- B. Notice of Hearing [D.I. 287, filed on December 21, 2022]
- C. [SEALED] Notice of Filing Under Seal Unredacted Parties in Interest List [D.I. 288, filed on December 21, 2022]
- D. [SEALED] Exhibit B to Declaration of Thomas M. Shea in Support of Debtors Application for an Order Authorizing the Retention and Employment of Ernst & Young LLP as Tax Services Provider *Nunc Pro Tunc* to November 28, 2022 [D.I. 298, filed on December 23, 2022]
- E. Notice of Filing Redacted Version of Exhibit B to Declaration of Thomas M. Shea in Support of Debtors Application for an Order Authorizing the Retention and Employment of Ernst & Young LLP as Tax Services Provider *Nunc Pro Tunc* to November 28, 2022 [D.I. 300, filed on December 23, 2022]

Status: This matter is adjourned to the hearing scheduled on January 20, 2023 at 10:00 a.m. (ET).

# **RESOLVED MATTERS:**

7. Motion of Debtors for Entry of an Order (I) Modifying Certain Creditor List Requirements; (II) Authorizing the Debtors to Serve Certain Parties by E-Mail; and (III) Granting Related Relief [D.I. 9, filed on November 14, 2022]

Response Deadline: December 14, 2022 at 4:00 p.m. (ET)

Responses Received: None.

- A. Declaration of John J. Ray III in Support of Chapter 11 Petitions and First Day Pleadings [D.I. 24, filed on November 17, 2022]
- B. Notice of Filing of Chapter 11 Petitions and Related Motions and Declarations [D.I. 48, filed on November 19, 2022]

- C. Notice of Filing of Consolidated List of Top 50 Creditors [D.I. 51, filed on November 19, 2022]
- D. Amended Notice of Filing of Chapter 11 Petitions and Related Motions and Declarations [D.I. 52, filed on November 20, 2022]
- E. Declaration of Edgar W. Mosley II in Support of Chapter 11 Petitions and First Day Pleadings [D.I. 57, filed on November 20, 2022]
- F. Second Amended Notice of Filing of Chapter 11 Petitions and Related Motions and Declarations [D.I. 58, filed on November 20, 2022]
- G. Supplemental Declaration of John J. Ray III in Support of Chapter 11 Petitions and First Day Pleadings [D.I. 92, filed on November 21, 2022]
- H. Supplemental Declaration of Edgar W. Mosley II in Support of Chapter 11 Petitions and First Day Pleadings [D.I. 93, filed on November 21, 2022]
- I. Notice of Revised Proposed Orders [D.I. 98, filed on November 22, 2022]
- J. Third Amended Notice of Filing of Chapter 11 Petitions and Related Motions and Declarations [D.I. 99, filed on November 22, 2022]
- K. Interim Order (I) Modifying Certain Creditor List Requirements; (II) Authorizing the Debtors to Serve Certain Parties by E-Mail; and (III) Granting Related Relief [D.I. 146, entered on November 23, 2022]
- L. Omnibus Notice of Second Day Hearing [D.I. 159, filed on November 26, 2022]
- M. Certification of Counsel [D.I. 394, filed on January 6, 2023]
- N. Final Order (I) Modifying Certain Creditor List Requirements, (II) Authorizing the Debtors to Serve Certain Parties by E-Mail, and (III) Granting Related Relief [D.I. 425, entered on January 9, 2023]

<u>Status</u>: On January 9, 2023, the Court entered an order granting the relief requested. Accordingly, a hearing on this matter is not required.

8. Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to Pay Certain Prepetition Claims of Critical Vendors, Foreign Vendors, 503(b)(9) Claimants and Lien Claimants, (II) Granting Administrative Expense Priority to All Undisputed Obligations on Account of Outstanding Orders, (III) Authorizing All Financial Institutions to Honor All Related Payment Requests and (IV) Granting Certain Related Relief [D.I. 46, filed on November 19, 2022]

Response Deadline: December 14, 2022 at 4:00 p.m. (ET)

# Responses Received:

- A. Informal comments received from the United States Trustee
- B. Informal comments received from the Official Committee of Unsecured Creditors

- A. Declaration of John J. Ray III in Support of Chapter 11 Petitions and First Day Pleadings [D.I. 24, filed on November 17, 2022]
- B. Notice of Filing of Chapter 11 Petitions and Related Motions and Declarations [D.I. 48, filed on November 19, 2022]
- C. Amended Notice of Filing of Chapter 11 Petitions and Related Motions and Declarations [D.I. 52, filed on November 20, 2022]
- D. Declaration of Edgar W. Mosley II in Support of Chapter 11 Petitions and First Day Pleadings [D.I. 57, filed on November 20, 2022]
- E. Second Amended Notice of Filing of Chapter 11 Petitions and Related Motions and Declarations [D.I. 58, filed on November 20, 2022]
- F. Supplemental Declaration of John J. Ray III in Support of Chapter 11 Petitions and First Day Pleadings [D.I. 92, filed on November 21, 2022]
- G. Supplemental Declaration of Edgar W. Mosley II in Support of Chapter 11 Petitions and First Day Pleadings [D.I. 93, filed on November 21, 2022]
- H. Third Amended Notice of Filing of Chapter 11 Petitions and Related Motions and Declarations [D.I. 99, filed on November 22, 2022]
- I. Certification of Counsel [D.I. 144, filed on November 23, 2022]
- J. Interim Order (I) Authorizing the Debtors to Pay Certain Prepetition Claims of Critical Vendors, Foreign Vendors, 503(b)(9) Claimants and Lien Claimants, (II) Granting Administrative Expense Priority to All Undisputed Obligations on Account of Outstanding Orders, (III) Authorizing All Financial Institutions to Honor All Related Payment Requests and (IV) Granting Certain Related Relief [D.I. 150, entered on November 23, 2022]
- K. Omnibus Notice of Second Day Hearing [D.I. 159, filed on November 25, 2022]
- L. Certification of Counsel [D.I. 399, filed on January 6, 2023]
- M. Final Order (I) Authorizing the Debtors to Pay Certain Prepetition Claims of Critical Vendors, Foreign Vendors, 503(B)(9) Claimants and Lien Claimants, (II) Granting Administrative Expense Priority to all Undisputed Obligations on Account of Outstanding Orders, (III) Authorizing all Financial Institutions to

Honor all Related Payment Requests and (IV) Granting Certain Related Relief [D.I. 429, entered on January 9, 2023]

<u>Status</u>: On January 9, 2023, the Court entered an order granting the relief requested. Accordingly, a hearing on this matter is not required.

9. Motion of Debtors for Entry of Interim and Final Orders (I) Establishing Notice and Objection Procedures for Transfers of Equity Securities and Claims of Worthless Stock Deductions and (II) Granting Certain Related Relief [D.I. 49, filed on November 19, 2022]

Response Deadline: December 14, 2022 at 4:00 p.m. (ET)

# Responses Received:

- A. Informal comments received from the United States Trustee
- B. Informal comments received from the Official Committee of Unsecured Creditors
- C. Informal comments received from the Securities and Exchange Commission

- A. Declaration of John J. Ray III in Support of Chapter 11 Petitions and First Day Pleadings [D.I. 24, filed on November 17, 2022]
- B. Notice of Filing of Chapter 11 Petitions and Related Motions and Declarations [D.I. 48, filed on November 19, 2022]
- C. Amended Notice of Filing of Chapter 11 Petitions and Related Motions and Declarations [D.I. 52, filed on November 20, 2022]
- D. Declaration of Edgar W. Mosley II in Support of Chapter 11 Petitions and First Day Pleadings [D.I. 57, filed on November 20, 2022]
- E. Second Amended Notice of Filing of Chapter 11 Petitions and Related Motions and Declarations [D.I. 58, filed on November 20, 2022]
- F. Supplemental Declaration of John J. Ray III in Support of Chapter 11 Petitions and First Day Pleadings [D.I. 92, filed on November 21, 2022]
- G. Supplemental Declaration of Edgar W. Mosley II in Support of Chapter 11 Petitions and First Day Pleadings [D.I. 93, filed on November 21, 2022]
- H. Notice of Revised Proposed Orders [D.I. 98, filed on November 22, 2022]
- I. Third Amended Notice of Filing of Chapter 11 Petitions and Related Motions and Declarations [D.I. 99, filed on November 22, 2022]

- J. Interim Order (I) Establishing Notice and Objection Procedures for Transfers of Equity Securities and Claims of Worthless Stock Deductions and (II) Granting Certain Related Relief [D.I. 139, entered on November 22, 2022]
- K. Notice of (I) Disclosure Procedures Applicable to Certain Holders of Common Stock or preferred Stock, (II) Disclosure Procedures for Transfers of and Declarations of Worthlessness with Respect to Common Stock, and (III) Final Hearing on the Application Thereof [D.I. 154, filed on November 23, 2022]
- L. Omnibus Notice of Second Day Hearing [D.I. 159, filed on November 25, 2022]
- M. Certification of Counsel [D.I. 396, filed on January 6, 2023]
- N. Notice of Withdrawal [D.I. 415, filed on January 8, 2023]
- O. Certification of Counsel [D.I. 417, filed on January 8, 2023]
- P. Final Order (I) Establishing Notice and Objection Procedures for Transfers of Equity Securities and Claims of Worthless Stock Deductions and (II) Granting Certain Related Relief [D.I. 434, entered on January 9, 2023]

<u>Status</u>: On January 9, 2023, the Court entered an order granting the relief requested. Accordingly, a hearing on this matter is not required.

10. Motion of Debtors for Entry of an Order (I) Authorizing the Debtors to (A) Pay Prepetition Compensation and Benefits and (B) Continue Compensation and Benefits and (II) Granting Certain Related Relief [D.I. 50, filed on November 19, 2022]

Response Deadline: December 14, 2022 at 4:00 p.m. (ET)

# Responses Received:

- A. Informal comments received from the United States Trustee
- B. Informal comments received from the Official Committee of Unsecured Creditors

- A. Declaration of John J. Ray III in Support of Chapter 11 Petitions and First Day Pleadings [D.I. 24, filed on November 17, 2022]
- B. Notice of Filing of Chapter 11 Petitions and Related Motions and Declarations [D.I. 48, filed on November 19, 2022]
- C. Amended Notice of Filing of Chapter 11 Petitions and Related Motions and Declarations [D.I. 52, filed on November 20, 2022]
- D. Declaration of Edgar W. Mosley II in Support of Chapter 11 Petitions and First Day Pleadings [D.I. 57, filed on November 20, 2022]

- E. Second Amended Notice of Filing of Chapter 11 Petitions and Related Motions and Declarations [D.I. 58, filed on November 20, 2022]
- F. Supplemental Declaration of John J. Ray III in Support of Chapter 11 Petitions and First Day Pleadings [D.I. 92, filed on November 21, 2022]
- G. Supplemental Declaration of Edgar W. Mosley II in Support of Chapter 11 Petitions and First Day Pleadings [D.I. 93, filed on November 21, 2022]
- H. Notice of Revised Proposed Orders [D.I. 98, filed on November 22, 2022]
- I. Third Amended Notice of Filing of Chapter 11 Petitions and Related Motions and Declarations [D.I. 99, filed on November 22, 2022]
- J. Interim Order (I) Authorizing the Debtors to (A) Pay Prepetition Compensation and Benefits and (B) Continue Compensation and Benefits and (II) Granting Certain Related Relief [D.I. 138, entered on November 22, 2022]
- K. Omnibus Notice of Second Day Hearing [D.I. 159, filed on November 25, 2022]
- L. Certification of Counsel [D.I. 395, filed on January 6, 2023]
- M. Final Order (I) Authorizing the Debtors to (A) Pay Prepetition Compensation and Benefits and (B) Continue Compensation and Benefits and (II) Granting Certain Related Relief [D.I. 426, entered on January 9, 2023]

<u>Status</u>: On January 9, 2023, the Court entered an order granting the relief requested. Accordingly, a hearing on this matter is not required.

11. Motion of the Debtors for Entry of an Order Authorizing the Debtors' Assumption of, and Entry into, the Custodial Services Agreement [D.I. 156, filed on November 23, 2022]

Response Deadline: December 7, 2022 at 4:00 p.m. (ET), extended to December 9, 2022 at 12:00 p.m. (ET) for the joint provisional liquidators of FTX Digital Markets Ltd. and to December 12, 2022 at 12:00 p.m. (ET) for the Office of the United States Trustee.

# Responses Received:

- A. Informal comments received from the Office of the United States Trustee
- B. Informal comments received from the Official Committee of Unsecured Creditors
- C. Informal comments received from the joint provisional liquidators of FTX Digital Markets Ltd.

# **Related Documents:**

A. Certification of Counsel [D.I. 416, filed on January 8, 2023]

B. Order Authorizing the Assumption of, and Entry Into, the Custodial Services Agreements [D.I. 433, entered on January 9, 2023]

<u>Status</u>: On January 9, 2023, the Court entered an order granting the relief requested. Accordingly, a hearing on this matter is not required.

12. Motion of Debtors for Entry of an Order Authorizing (I) Debtors to Pay Certain Taxes and Fees and (II) Financial Institutions to Honor Related Payment Requests [D.I. 267, filed on December 21, 2022]

Response Deadline: January 4, 2023 at 4:00 p.m. (ET)

# Responses Received:

- A. Informal comments received from the United States Trustee
- B. Informal comments received from the Official Committee of Unsecured Creditors

#### Related Documents:

- A. Notice of Hearing [D.I. 287, filed on December 21, 2022]
- B. Certification of Counsel [D.I. 397, filed on January 6, 2023]
- C. Order Authorizing (I) Debtors to Pay Certain Taxes and Fees and (II) Financial Institutions to Honor Related Payment Requests [D.I. 427, entered on January 9, 2023]

<u>Status</u>: On January 9, 2023, the Court entered an order granting the relief requested. Accordingly, a hearing on this matter is not required.

13. Debtors' Motion for an Order Authorizing and Approving (I) The Employment and Retention of Owl Hill Advisory, LLC and (II) The Designation of John J. Ray III as Chief Executive Officer *Nunc Pro Tunc* to the Petition Date [D.I. 269, filed on December 21, 2022]

Response Deadline: January 4, 2023 at 4:00 p.m. (ET); extended for the United States Trustee to January 6, 2023 at 4:00 p.m. (ET)

# Responses Received:

- A. Informal comments received from the Office of the United States Trustee
- B. Informal comments received from the Official Committee of Unsecured Creditors

- A. Notice of Hearing [D.I. 287, filed on December 21, 2022]
- B. [SEALED] Notice of Filing Under Seal Unreducted Parties in Interest List [D.I.

- 288, filed on December 21, 2022]
- C. Supplemental Declaration of John J. Ray III in Support of Debtors' Motion for an Order Authorizing and Approving (I) The Employment and Retention of Owl Hill Advisory, LLC and (II) The Designation of John J. Ray III as Chief Executive Officer *Nunc Pro Tunc* to the Petition Date [D.I. 419, filed on January 9, 2023]
- D. Certification of Counsel [D.I. 420, filed on January 9, 2023]
- E. Order Granting Debtors' Motion for an Order Authorizing and Approving (I) The Employment and Retention of Owl Hill Advisory, LLC and (II) The Designation of John J. Ray III as Chief Executive Officer *Nunc Pro Tunc* to the Petition Date [D.I. 436, entered on January 9, 2023]

<u>Status</u>: On January 9, 2023, the Court entered an order granting the relief requested. Accordingly, a hearing on this matter is not required.

14. Application of the Debtors to Approve the Employment and Retention of Landis Rath & Cobb LLP as Co-Counsel, *Nunc Pro Tunc* to the Petition Date, Pursuant to Bankruptcy Code Section 327(a), Bankruptcy Rules 2014 and 2016 and Local Rule 2014-1 [D.I. 272, filed on December 21, 2022]

Response Deadline: January 4, 2023 at 4:00 p.m. (ET), extended for the United States Trustee to January 6, 2023 at 4:00 p.m. (ET)

#### Responses Received:

- A. Informal Comments from the Office of the United States Trustee
- B. Informal comments received from the Official Committee of Unsecured Creditors

# Related Documents:

- A. Notice of Hearing [D.I. 287, filed on December 21, 2022]
- B. [SEALED] Notice of Filing Under Seal Unreducted Parties in Interest List [D.I. 288, filed on December 21, 2022]
- C. Certification of Counsel [D.I. 398, filed on January 6, 2023]
- D. Order Authorizing the Employment and Retention of Landis Rath & Cobb LLP as Bankruptcy Co-Counsel, *Nunc Pro Tunc* to the Petition Date, Pursuant to Bankruptcy Code Section 327(a), Bankruptcy Rules 2014 and 2016 and Local Rule 2014-1 [D.I. 428, entered on January 9, 2023]

<u>Status</u>: On January 9, 2023, the Court entered an order granting the relief requested. Accordingly, a hearing on this matter is not required.

15. Debtors' Motion for an Order Authorizing and Approving (I) the Retention and Employment of RLKS Executive Solutions LLC and (II) Designating the Chief Officers as Officers of the Debtors *Nunc Pro Tunc* to November 15, 2022 [D.I. 276, filed on December 21, 2022]

Response Deadline: January 4, 2023 at 4:00 p.m. (ET); extended for the United States Trustee to January 6, 2023 at 4:00 p.m. (ET)

# Responses Received:

- A. Informal comments received from the Office of the United States Trustee
- B. Informal comments received from the Official Committee of Unsecured Creditors

# Related Documents:

- A. Notice of Hearing [D.I. 287, filed on December 21, 2022]
- B. [SEALED] Notice of Filing Under Seal Unredacted Parties in Interest List [D.I. 288, filed on December 21, 2022]
- C. Supplemental Declaration of Kathryn Schultea in Support of Debtors' Motion for an Order Authorizing and Approving (I) the Retention and Employment of RLKS Executive Solutions LLC and (II) Designating the Chief Officers as Officers of the Debtors *Nunc Pro Tunc* to November 15, 2022 [D.I. 421, filed on January 9, 2023]
- D. Certification of Counsel [D.I. 422, filed on January 9, 2023]
- E. Order Granting Debtors' Motion for an Order Authorizing and Approving (I) the Retention and Employment of RLKS Executive Solutions LLC and (II) Designating the Chief Officers as Officers of the Debtors *Nunc Pro Tunc* to November 15, 2022 [D.I. 437, entered on January 9, 2023]

<u>Status</u>: On January 9, 2023, the Court entered an order granting the relief requested. Accordingly, a hearing on this matter is not required.

16. Motion of Debtors for Entry of An Order Implementing Certain Procedures to Retain, Compensate and Reimburse Professionals Utilized in the Ordinary Course of Business [D.I. 282, filed on December 21, 2022]

Response Deadline: January 4, 2023 at 4:00 p.m. (ET)

#### Responses Received:

- A. Informal comments received from the Office of the United States Trustee
- B. Informal comments received from the Official Committee of Unsecured Creditors

#### Related Documents:

- A. Notice of Hearing [D.I. 287, filed on December 21, 2022]
- B. Certification of Counsel [D.I. 414, filed on January 8, 2023]
- C. Order Authorizing Procedures to Retain, Compensate and Reimburse Professionals Utilized in the Ordinary Course of Business [D.I. 432, entered on January 9, 2023]

<u>Status</u>: On January 9, 2023, the Court entered an order granting the relief requested. Accordingly, a hearing on this matter is not required.

17. Motion of Debtors for Entry of an Order (A) Authorizing the Debtors to Enter into the Stipulation with Voyager Digital, LLC and (B) Granting Related Relief [D.I. 283, filed on December 21, 2022]

Response Deadline: January 4, 2023 at 4:00 p.m. (ET)

# Responses Received:

- A. Informal comments received from the Office of the United States Trustee
- B. Informal comments received from the Official Committee of Unsecured Creditors

### **Related Documents:**

- A. Notice of Hearing [D.I. 287, filed on December 21, 2022]
- B. Notice of Filing Revised Stipulation [D.I. 392, filed on January 6, 2023]
- C. Certification of Counsel [D.I. 393, filed on January 6, 2023]
- D. Order (A) Authorizing the Debtors to Enter into the Stipulation with Voyager Digital, LLC and (B) Granting Related Relief [D.I. 423, entered on January 9, 2023]

<u>Status</u>: On January 9, 2023, the Court entered an order granting the relief requested. Accordingly, a hearing on this matter is not required.

18. Motion of Debtors for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals [D.I. 286, filed on December 21, 2022]

Response Deadline: January 4, 2023 at 4:00 p.m. (ET)

# Responses Received:

A. Informal comments received from the Office of the United States Trustee

B. Informal comments received from the Official Committee of Unsecured Creditors

#### Related Documents:

- A. Notice of Hearing [D.I. 287, filed on December 21, 2022]
- B. Certification of Counsel [D.I. 418, filed on January 9, 2023]
- C. Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals [D.I. 435, entered on January 9, 2023]

<u>Status</u>: On January 9, 2023, the Court entered an order granting the relief requested. Accordingly, a hearing on this matter is not required.

# **MATTERS GOING FORWARD:**

19. Motion of Debtors for Entry of an Order (I) Extending the Time to File (A) Schedules of Assets and Liabilities and Statements of Financial Affairs and (B) Rule 2015.3 Financial Reports and (II) Granting Certain Related Relief [D.I. 26, filed on November 17, 2022]

Response Deadline: December 14, 2022 at 4:00 p.m. (ET); January 4, 2023 at 4:00 p.m. (ET) with respect to the Supplement to Motion filed at D.I. 266

# Responses Received:

- A. Informal comments received from the Office of the United States Trustee
- B. Objection of the United States Trustee to Motion of the Debtors to Extend Time to File Schedules of Assets and Liabilities, Statements of Financial Affairs, and Rule 2015.3 Reports [D.I. 364, filed on January 4, 2023]
- C. Objection of the Ad Hoc Committee of Customers and Creditors of FTX Trading Ltd. and Its Affiliated Debtors and Debtors-in-Possession to the Debtors' Motion for Entry of an Order Extending the Time to File Schedules and Statements [D.I. 370, filed on January 4, 2023]

- A. Declaration of John J. Ray III in Support of Chapter 11 Petitions and First Day Pleadings [D.I. 24, filed on November 17, 2022]
- B. Notice of Filing of Chapter 11 Petitions and Related Motions and Declarations [D.I. 48, filed on November 19, 2022]
- C. Amended Notice of Filing of Chapter 11 Petitions and Related Motions and Declarations [D.I. 52, filed on November 20, 2022]
- D. Declaration of Edgar W. Mosley II in Support of Chapter 11 Petitions and First Day Pleadings [D.I. 57, filed on November 20, 2022]

- E. Second Amended Notice of Filing of Chapter 11 Petitions and Related Motions and Declarations [D.I. 58, filed on November 20, 2022]
- F. Supplemental Declaration of John J. Ray III in Support of Chapter 11 Petitions and First Day Pleadings [D.I. 92, filed on November 21, 2022]
- G. Supplemental Declaration of Edgar W. Mosley II in Support of Chapter 11 Petitions and First Day Pleadings [D.I. 93, filed on November 21, 2022]
- H. Third Amended Notice of Filing of Chapter 11 Petitions and Related Motions and Declarations [D.I. 99, filed on November 22, 2022]
- I. Omnibus Notice of Second Day Hearing [D.I. 159, filed on November 26, 2022]
- J. Supplement to Motion of Debtors for Entry of an Order Extending the Time to File (A) Schedules of Assets and Liabilities and Statements of Financial Affairs and (B) Rule 2015.3 Financial Reports [D.I. 266, filed on December 21, 2022]
- K. Debtors' Reply in Support of Motion of Debtors for Entry of an Order Extending the Time to File (A) Schedules of Assets and Liabilities and Statements of Financial Affairs and (B) Rule 2015.3 Financial Reports [D.I. 406, filed on January 8, 2023]
- L. Notice of Debtors' Intent to Offer Witness Testimony at the Hearing on January 11, 2023 [D.I. 449, filed on January 9, 2023]
- M. Notice of Withdrawal of Docket No. 370 [D.I. 456, filed on January 10, 2023]
- N. Certification of Counsel [D.I. 461, filed on January 10, 2023]

Status: The Ad Hoc Committee of Customers and Creditors of FTX Trading Ltd. and Its Affiliated Debtors and Debtors-in-Possession withdrew its objection at D.I. 370. A certification of counsel has been filed and submitted in accordance with the Court's procedures. Accordingly, a hearing on this matter is not required unless the Court has any questions.

20. Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to Maintain a Consolidated List of Creditors in Lieu of Submitting a Separate Matrix for Each Debtor, (II) Authorizing the Debtors to Redact or Withhold Certain Confidential Information of Customers and Personal Information of Individuals and (III) Granting Certain Related Relief [D.I. 45, filed on November 19, 2022]

Response Deadline: December 9, 2022 at 4:00 p.m. (ET), extended to December 12, 2022 at 12:00 p.m. (ET) for the Office of the United States Trustee.

# Responses Received:

A. Expedited Motion of Bloomberg L.P., Dow Jones & Company, Inc., the New

York Times Company and the Financial Times Ltd. to Intervene for the Limited Purpose of Objecting to the Motion of Debtors for Entry of a Final Order Authorizing the Debtors to Redact or Withhold Certain Confidential Information of Customers and Personal Information of Individuals [D.I. 196, filed on December 9, 2022]

- B. United States Trustee's Objection to the Motion of the Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to Maintain a Consolidated List of Creditors in Lieu of Submitting a Separate Matrix for Each Debtor, (II) Authorizing the Debtors to Redact or Withhold Certain Confidential Information of Customers and Personal Information of Individuals and (III) Granting Certain Related Relief [D.I. 200, filed on December 12, 2022]
- C. Supplement to United States Trustee's Objection to the Motion of the Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to Maintain a Consolidated List of Creditors in Lieu of Submitting a Separate Matrix for Each Debtor, (II) Authorizing the Debtors to Redact or Withhold Certain Confidential Information of Customers and Personal Information of Individuals and (III) Granting Certain Related Relief [D.I. 362, filed on January 4, 2023]

- A. Declaration of John J. Ray III in Support of Chapter 11 Petitions and First Day Pleadings [D.I. 24, filed on November 17, 2022]
- B. Notice of Filing of Chapter 11 Petitions and Related Motions and Declarations [D.I. 48, filed on November 19, 2022]
- C. Amended Notice of Filing of Chapter 11 Petitions and Related Motions and Declarations [D.I. 52, filed on November 20, 2022]
- D. Declaration of Edgar W. Mosley II in Support of Chapter 11 Petitions and First Day Pleadings [D.I. 57, filed on November 20, 2022]
- E. Second Amended Notice of Filing of Chapter 11 Petitions and Related Motions and Declarations [D.I. 58, filed on November 20, 2022]
- F. Supplemental Declaration of John J. Ray III in Support of Chapter 11 Petitions and First Day Pleadings [D.I. 92, filed on November 21, 2022]
- G. Supplemental Declaration of Edgar W. Mosley II in Support of Chapter 11 Petitions and First Day Pleadings [D.I. 93, filed on November 21, 2022]
- H. Notice of Revised Proposed Orders [D.I. 98, filed on November 22, 2022]
- I. Third Amended Notice of Filing of Chapter 11 Petitions and Related Motions and Declarations [D.I. 99, filed on November 22, 2022]

- J. Interim Order (I) Authorizing the Debtors to Maintain a Consolidated List of Creditors in Lieu of Submitting a Separate Matrix for Each Debtor, (II) Authorizing the Debtors to Redact or Withhold Certain Confidential Information of Customers and Personal Information of Individuals and (III) Granting Certain Related Relief [D.I. 157, entered on November 23, 2022]
- K. Order Granting Certain Media Parties' Expedited Motion to Intervene for the Limited Purpose of Presenting an Objection to Debtors' Motion for Entry of Final Order Authorizing the Debtors to Redact or Withhold Certain Confidential Information of Customers and Person Information of Individuals [D.I. 255, entered on December 19, 2022]
- L. Joinder of the Ad Hoc Committee of Non-US Customers of FTX.com in Connection with the Motion of the Debtors for Entry of Interim and Final Orders Authorizing the Debtors to Redact or Withhold Certain Confidential Information of Customers [D.I. 45] [D.I. 327, filed on December 28, 2022]
- M. Debtors' Reply in Support of Motion for Entry of an Order Authorizing Debtors to Redact or Withhold Certain Confidential Information [D.I. 407, filed January 8, 2023]
- N. Joinder of Official Committee of Unsecured Creditors to Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to Maintain a Consolidated List of Creditors in Lieu of Submitting a Separate Matrix for Each Debtor, (II) Authorizing the Debtors to Redact or Withhold Certain Confidential Information of Customers and Personal Information of Individuals and (III) Granting Certain Related Relief [D.I. 408, filed on January 8, 2023]
- O. Declaration of Kevin M. Cofsky in Support of Debtors' Motion for Entry of an Order Authorizing Debtors to Redact or Withhold Certain Confidential Information [D.I. 411, filed on January 8, 2023]
- P. Notice of Debtors' Intent to Offer Witness Testimony at the Hearing on January 11, 2023 [D.I. 449, filed on January 9, 2023]

Status: This matter is going forward.

21. Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Operate A Postpetition Cash Management System, (B) Maintain Existing Business Forms, and (C) Perform Intercompany Transactions, (II) Granting a Partial Waiver of the Deposit Guidelines Set Forth in Section 345(b), and (III) Granting Certain Related Relief [D.I. 47, filed on November 19, 2022]

Response Deadline: December 14, 2022 at 4:00 p.m. (ET), extended for the United States Trustee to January 7, 2023 at 12:00 p.m. (ET)

# Responses Received:

- A. Informal comments received from the United States Trustee and the Securities Exchange Commission.
- B. Restated Objection of Evolve Bank & Trust to Motion of Debtors for Entry of Final Orders (I) Authorizing the Debtors to (A) Operate a Postpetition Cash Management System, (B) Maintain Existing Business Forms and (C) Perform Intercompany Transactions, (II) Granting a Partial Waiver of the Deposit Guidelines Set Forth in Section 345(b) and (III) Granting Related Relief [D.I. 229, filed on December 14, 2022]
- C. Limited Objection and Reservation of Rights of Paradigm Operations LP to Motion of Debtors for Entry of Final Order (I) Authorizing the Debtors to (A) Operate a Postpetition Cash Management System, (B) Maintain Existing Business Forms, and (C) Perform Intercompany Transactions, (II) Granting a Partial Waiver of the Deposit Guidelines Set Forth in Section 345(b), and (III) Granting Certain Related Relief [D.I. 388, filed on January 6, 2023]
- D. Reservation of Rights of the Lightspeed Funds with Respect to the Debtors' Motion for Entry of Interim and Final Orders Authorizing the Debtors to (A) Operate a Postpetition Cash Management System, (B) Maintain Existing Business Forms and (C) Perform Intercompany Transactions, (II) Granting a Partial Waiver of the Deposit Guidelines Set Forth in Section 345(b) and (III) Granting Certain Related Relief [D.I. 389, filed on January 6, 2023]
- E. Limited Objection of United States Trustee to Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Operate a Postpetition Cash Management System, (B) Maintain Existing Business Forms, and (C) Perform Intercompany Transactions, (II) Granting a Partial Waiver of the Deposit Guidelines Set Forth in Section 345(b), and (III) Granting Certain Related Relief [D.I. 401, filed on January 7, 2023]

- A. Declaration of John J. Ray III in Support of Chapter 11 Petitions and First Day Pleadings [D.I. 24, filed on November 17, 2022]
- B. Notice of Filing of Chapter 11 Petitions and Related Motions and Declarations [D.I. 48, filed on November 19, 2022]
- C. Amended Notice of Filing of Chapter 11 Petitions and Related Motions and Declarations [D.I. 52, filed on November 20, 2022]
- D. Declaration of Edgar W. Mosley II in Support of Chapter 11 Petitions and First Day Pleadings [D.I. 57, filed on November 20, 2022]
- E. Second Amended Notice of Filing of Chapter 11 Petitions and Related Motions

- and Declarations [D.I. 58, filed on November 20, 2022]
- F. Supplemental Declaration of John J. Ray III in Support of Chapter 11 Petitions and First Day Pleadings [D.I. 92, filed on November 21, 2022]
- G. Supplemental Declaration of Edgar W. Mosley II in Support of Chapter 11 Petitions and First Day Pleadings [D.I. 93, filed on November 21, 2022]
- H. Notice of Revised Proposed Orders [D.I. 98, filed on November 22, 2022]
- I. Third Amended Notice of Filing of Chapter 11 Petitions and Related Motions and Declarations [D.I. 99, filed on November 22, 2022]
- J. Certification of Counsel [D.I. 143, filed on November 23, 2022]
- K. Interim Order (I) Authorizing the Debtors to (A) Operate A Postpetition Cash Management System, (B) Maintain Existing Business Forms, and (C) Perform Intercompany Transactions, (II) Granting a Partial Waiver of the Deposit Guidelines Set Forth in Section 345(b), and (III) Granting Certain Related Relief [D.I. 145, entered on November 23, 2022]
- L. Omnibus Notice of Second Day Hearing [D.I. 159, filed on November 25, 2022]
- M. Debtors' Reply in Support of the Motion of Debtors for Entry of a Final Orders (I) Authorizing the Debtors to (A) Operate A Postpetition Cash Management System, (B) Maintain Existing Business Forms, and (C) Perform Intercompany Transactions, (II) Granting a Partial Waiver of the Deposit Guidelines Set Forth in Section 345(b), and (III) Granting Certain Related Relief [D.I. 409, filed January 8, 2023]
- N. Second Supplemental Declaration of Edgar W. Mosley II [D.I. 460, filed on January 10, 2023]
- O. Notice of Revised Proposed Orders [D.I. 464, filed on January 11, 2023]

Status: This matter will go forward.

22. Motion for Entry of Interim and Final Orders (A) Authorizing the Debtors, In Their Sole Discretion, to Provide Indemnification and Exculpation to Certain Individuals, (B) Authorizing Certain Actions Pursuant to Section 363 of the Bankruptcy Code, and (C) Granting Certain Related Relief [D.I. 94, filed on November 22, 2022]

Response Deadline: December 14, 2022 at 4:00 p.m. (ET)

Responses Received: None.

#### Related Documents:

- A. Declaration of John J. Ray III in Support of Chapter 11 Petitions and First Day Pleadings [D.I. 24, filed on November 17, 2022]
- B. Notice of Filing of Chapter 11 Petitions and Related Motions and Declarations [D.I. 48, filed on November 19, 2022]
- C. Amended Notice of Filing of Chapter 11 Petitions and Related Motions and Declarations [D.I. 52, filed on November 20, 2022]
- D. Declaration of Edgar W. Mosley II in Support of Chapter 11 Petitions and First Day Pleadings [D.I. 57, filed on November 20, 2022]
- E. Second Amended Notice of Filing of Chapter 11 Petitions and Related Motions and Declarations [D.I. 58, filed on November 20, 2022]
- F. Supplemental Declaration of John J. Ray III in Support of Chapter 11 Petitions and First Day Pleadings [D.I. 92, filed on November 21, 2022]
- G. Supplemental Declaration of Edgar W. Mosley II in Support of Chapter 11 Petitions and First Day Pleadings [D.I. 93, filed on November 21, 2022]
- H. Third Amended Notice of Filing of Chapter 11 Petitions and Related Motions and Declarations [D.I. 99, filed on November 22, 2022]
- I. Interim Order (A) Authorizing the Debtors, in their Sole Discretion, to Provide Indemnification and Exculpation to Certain Individuals, (B) Authorizing Certain Actions Pursuant to Section 363 of the Bankruptcy Code, and (C) Granting Certain Related Relief [D.I. 140, entered on November 22, 2022]
- J. Omnibus Notice of Second Day Hearing [D.I. 159, filed on November 25, 2022]
- K. Certification of Counsel [D.I. 302, filed on December 23, 2022]
- L. Order (A) Authorizing the Debtors' Indemnification and Exculpation Motion and the Interim Indemnification and Exculpation Order to be Unsealed (B) Granting Related Relief [D.I. 323, entered on December 28, 2022]
- M. [SEALED] List of Authorized Persons [D.I. 457, filed on January 10, 2023]
- N. [SEALED] List of Authorized Persons [D.I. 463, filed on January 11, 2023]
- O. Notice of Revised Proposed Orders [D.I. 464, filed on January 11, 2023]

Status: This matter will go forward.

23. Motion of Miami-Dade County, Florida, for Relief from the Automatic Stay to Terminate

the Naming Rights Agreement [D.I. 135, filed on November 22, 2022]

Response Deadline: December 9, 2022 at 4:00 p.m. (ET), extended to January 4, 2023 at 4:00 p.m. (ET) for the Debtors.

Responses Received: None.

# Related Documents:

A. Certification of Counsel Regarding Stipulation for Resolution of Miami Dade County's Motion for Stay Relief to Terminate and Debtors' Motion to Reject [D.I. 462, filed on January 11, 2023]

<u>Status</u>: A certification of counsel has been filed and submitted in accordance with the Court's procedures. Accordingly, a hearing on this matter is not required unless the Court has any questions.

24. Motion of Debtors for Entry of Orders (I)(A) Approving Bid Procedures, Stalking Horse Protections and the Form and Manner of Notices for the Sale of the Certain Businesses; (B) Approving Assumption and Assignment Procedures and (C) Scheduling Auction(s) and Sale Hearing(s) and (II)(A) Approving the Sale(s) Free and Clear of Liens, Claims, Interests and Encumbrances and (B) Authorizing Assumption and Assignment of Executory Contracts and Unexpired Leases [D.I. 233, filed on December 15, 2022]

Response Deadline: December 29, 2022 at 4:00 p.m. (ET), extended to January 4, 2023 for Ad Hoc Committee of Non-US Customers of FTX.com and to January 7, 2021 at 12:00 p.m. (ET) for the United States Trustee.

# Responses Received:

- A. Informal Comments from the Ad Hoc Committee of Non-US Customers of FTX.com
- B. Objection to Motion of Debtors for Entry of Orders [D.I.s 329 & 358, filed on December 29, 2022]
- C. Preliminary Statement and Reservation of Rights of the Foreign Representatives of the Chapter 15 Debtor Regarding the Motion of Debtors for Entry of Orders (I)(A) Approving Bid Procedures, Stalking Horse Protections and the Form and Manner of Notices for the Sale of the Certain Businesses; (B) Approving Assumption and Assignment Procedures and (C) Scheduling Auction(s) and Sale Hearing(s) and (II)(A) Approving the Sale(s) Free and Clear of Liens, Claims, Interests, and Encumbrances and (B) Authorizing Assumption and Assignment of Executory Contracts and Unexpired Leases [D.I. 330, filed on December 29, 2022]
- D. Reservation of Rights and Limited Objection of the Ad Hoc Committee of Non-US Customers of FTX.com to Motion of Debtors for Entry of Orders (I)(A)

- Approving Bid Procedures, Stalking Horse Protections and the Form and Manner of Notices for the Sale of the Certain Businesses; (B) Approving Assumption and Assignment Procedures and (C) Scheduling Auction(s) and Sale Hearing(s) and (II)(A) Approving the Sale(s) Free and Clear of Liens, Claims, Interests and Encumbrances and (B) Authorizing Assumption and Assignment of Executory Contracts and Unexpired Leases [D.I. 371, filed on January 4, 2023]
- E. Objection of the United States Trustee to the Motion of the Debtors for Entry of an Order (A) Approving Bid Procedures, Stalking Horse Protections and the Form and Manner of Notices for the Sale of Certain Businesses, (B) Approving Assumption and Assignment Procedures and (C) Scheduling Auction(s) and Sale Hearing(s) [D.I. 400, filed on January 7, 2023]
- F. Reservation of Rights of Official Committee of Unsecured Creditors Regarding Motion of Debtors for Entry of Orders (I)(A) Approving Bid Procedures, Stalking Horse Protections and the Form and Manner of Notices for the Sale of the Certain Businesses; (B) Approving Assumption and Assignment Procedures and (C) Scheduling Auction(s) and Sale Hearing(s) and (II)(A) Approving the Sale(s) Free and Clear of Liens, Claims, Interests and Encumbrances and (B) Authorizing Assumption and Assignment of Executory Contracts and Unexpired Leases [D.I. 405, filed on January 8, 2023]

- A. Debtors' Reply in Support of Motion of Debtors for Entry of Orders (I)(A) Approving Bid Procedures, Stalking Horse Protections and the Form and Manner of Notices for the Sale of the Certain Businesses; (B) Approving Assumption and Assignment Procedures and (C) Scheduling Auction(s) and Sale Hearing(s) and (II)(A) Approving the Sale(s) Free and Clear of Liens, Claims, Interests and Encumbrances and (B) Authorizing Assumption and Assignment of Executory Contracts and Unexpired Leases [D.I. 410, filed on January 8, 2023]
- B. Declaration of Brian D. Glueckstein in Support of Motion of Debtors for Entry of Orders (I)(A) Approving Bid Procedures, Stalking Horse Protections and the Form and Manner of Notices for the Sale of the Certain Businesses; (B) Approving Assumption and Assignment Procedures and (C) Scheduling Auction(s) and Sale Hearing(s) and (II)(A) Approving the Sale(s) Free and Clear of Liens, Claims, Interests and Encumbrances and (B) Authorizing Assumption and Assignment of Executory Contracts and Unexpired Leases [D.I. 412, filed on January 8, 2023]
- C. Declaration of Kevin M. Cofsky in Support of Motion of Debtors for Entry of Orders (I)(A) Approving Bid Procedures, Stalking Horse Protections and the Form and Manner of Notices for the Sale of the Certain Businesses; (B) Approving Assumption and Assignment Procedures and (C) Scheduling Auction(s) and Sale Hearing(s) and (II)(A) Approving the Sale(s) Free and Clear of Liens, Claims, Interests and Encumbrances and (B) Authorizing Assumption

and Assignment of Executory Contracts and Unexpired Leases [D.I. 413, filed on January 8, 2023]

- D. Notice of Debtors' Intent to Offer Witness Testimony at the Hearing on January 11, 2023 [D.I. 449, filed on January 9, 2023]
- E. Notice of Revised Proposed Orders [D.I. 464, filed on January 11, 2023]

Status: This matter will go forward.

25. Motion to Compel Rejection of Executory Contracts or in the Alternative for Relief from Automatic Stay to Terminate Agreement Under Sections 365 and 362(d), of the Bankruptcy Code [D.I. 243, filed on December 16, 2022]

Response Deadline: January 4, 2023 at 4:00 p.m. (ET)

Responses Received: None.

# Related Documents:

- A. Declaration of Brian Davidoff in Support of Motion to Compel Rejection of Executory Contract or in the Alternative for Relief from the Automatic Stay [D.I. 244, filed on December 16, 2022]
- B. Declaration of Vyte Danileviciute in Support of Motion to Compel Rejection of Executory Contract or in the Alternative for Relief from the Automatic Stay to Terminate Agreement [D.I. 245, filed on December 16, 2022]
- C. [SEALED] Motion for Entry of an Order Authorizing North America League of Legends, LC to File the Unredacted Strategic Sponsorship Agreement Under Seal [D.I. 264, filed on December 21, 2022]
- D. Motion for Entry of an Order Authorizing North America League of Legends, LLC to File the Unredacted Strategic Sponsorship Agreement Under Seal [D.I. 289, filed on December 22, 2022]

Status: The parties have reached an agreement resolving this matter and a revised form of order will be submitted under certification of counsel.

26. [SEALED] Motion for Entry of an Order Authorizing North America League of Legends, LLC to File the Unredacted Strategic Sponsorship Agreement Under Seal [D.I. 264, filed on December 21, 2022]

Response Deadline: January 4, 2023 at 4:00 p.m. (ET)

Responses Received: None.

#### Related Documents:

A. [SEALED] Sponsorship Agreement [D.I. 265, filed on December 21, 2022]

Related Documents: None.

<u>Status</u>: The parties are discussing and negotiating an agreement to resolve this matter and intend to file a stipulation under certification of counsel. This matter is going forward.

27. Debtors' First Omnibus Motion for Entry of an Order Authorizing the Debtors to (I) Reject Certain Unexpired Leases Effective as of the Rejection Date and (II) Abandon Personal Property, if any, Associated Therewith [D.I. 268, filed on December 21, 2022]

Response Deadline: January 4, 2023 at 4:00 p.m. (ET)

# Responses Received:

- A. Informal comments received from the Office of the United States Trustee
- B. Informal comments received from the Official Committee of Unsecured Creditors

# **Related Documents:**

- A. Notice of Hearing [D.I. 287, filed on December 21, 2022]
- B. Certification of Counsel Regarding Stipulation Between the Debtors and 1450 Brickell, LLC [D.I. 403, filed on January 7, 2023]
- C. Certification of Counsel Regarding Stipulation Between the Debtors and Brickell Owner LLC [D.I. 404, filed on January 7, 2023]
- D. Order Approving Stipulation between the Debtors and 1450 Brickell, LLC [D.I. 430, entered on January 9, 2023]
- E. Order Approving Stipulation between the Debtors and Brickell Owner LLC [D.I. 431, entered on January 9, 2023]
- F. Certification of Counsel Regarding Stipulation Between the Debtors and The Metropolitan Square Associates LLC [D.I. 447, filed on January 9, 2023]
- G. Order Approving Stipulation Between the Debtors and The Metropolitan Square Associates LLC [D.I. 455, entered on January 10, 2023]
- H. Certification of Counsel [D.I. 458, filed on January 10, 2023]

Status: On January 9, 2023, the Court entered orders approving stipulations between the Debtors, 1450 Brickell, LLC, Brickell Owner LLC and The Metropolitan Square Associates LLC. A revised form of order was filed under certification of counsel and submitted in accordance with the Court's procedures. Accordingly, a hearing on

# this matter is not required unless the Court has any questions.

28. Debtors' Application for Entry of an Order Authorizing Employment and Retention of Kroll Restructuring Administration LLC as Administrative Advisor Nunc Pro Tunc to the Petition Date [D.I. 279, filed on December 21, 2022]

Response Deadline: January 4, 2023 at 4:00 p.m. (ET), extended for the United States Trustee to January 6, 2023 at 4:00 p.m. (ET)

# Responses Received:

A. Informal comments received from the Office of the United States Trustee

# Related Documents:

- Notice of Hearing [D.I. 287, filed on December 21, 2022] A.
- В. [SEALED] Notice of Filing Under Seal Unredacted Parties in Interest List [D.I. 288, filed on December 21, 2022]

Status: This matter is adjourned to the hearing scheduled on January 20, 2023 at 10:00 a.m. (ET).

29. Motion for Entry of an Order Authorizing North America League of Legends, LLC to File the Unredacted Strategic Sponsorship Agreement Under Seal [D.I. 289, filed on December 22, 2022]

Response Deadline: January 4, 2023 at 4:00 p.m. (ET)

Responses Received: None.

Related Documents: None.

Status: This matter is going forward.

#### **STATUS CONFERENCE:**

**30.** Motion of the United States Trustee for Entry of an Order Directing the Appointment of an Examiner [D.I. 176, filed on December 1, 2022]

Response Deadline: N/A

Responses Received: N/A

### **Related Documents:**

State of Wisconsin's Joinder to the Motion of the United States Trustee for Α. Entry of an Order Directing the Appointment of an Examiner [D.I. 263, filed on December 21, 2022]

B. Joinder to Motion for Entry of an Order Appointing an Examiner [D.I. 339, filed on January 3, 2023]

<u>Status</u>: This matter is going forward as a status conference regarding scheduling a hearing date for the motion.

Dated: January 11, 2023 Wilmington, Delaware

# LANDIS RATH & COBB LLP

/s/ Matthew R. Pierce

Adam G. Landis (No. 3407)
Kimberly A. Brown (No. 5138)
Matthew R. Pierce (No. 5946)
919 Market Street, Suite 1800
Wilmington, Delaware 19801
Telephone: (302) 467-4400
Facsimile: (302) 467-4450
E-mail: landis@lrclaw.com
brown@lrclaw.com
pierce@lrclaw.com

-and-

#### SULLIVAN & CROMWELL LLP

Andrew G. Dietderich (admitted *pro hac vice*)
James L. Bromley (admitted *pro hac vice*)
Brian D. Glueckstein (admitted *pro hac vice*)
Alexa J. Kranzley (admitted *pro hac vice*)
125 Broad Street
New York, NY 10004

Telephone: (212) 558-4000 Facsimile: (212) 558-3588

E-mail: dietdericha@sullcrom.com bromleyj@sullcrom.com gluecksteinb@sullcrom.com kranzleya@sullcrom.com

Proposed Counsel for the Debtors and Debtors-in-Possession